## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

This document relates to: *All Actions* 

MDL No. 19-2875 (RBK/JS)

## [PROPOSED] ORDER NO. \_\_

Having reviewed Plaintiffs' motion for Rule 37 sanctions against ZHP as well as Defendants' opposition and Plaintiffs' reply,

It is hereby ORDERED this \_\_\_ day of February, 2022 that Plaintiffs' request is **GRANTED**: the Court hereby strikes and suppresses ZHP and its subsidiaries' Answer and Defenses, deems the allegations in Plaintiffs' Amended Master Complaints admitted with respect to ZHP and its subsidiaries for all purposes, and precludes ZHP and its subsidiaries from defending Plaintiffs' claims.